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ATTORNEY FOR: Plaintiff
BERT MEYER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,)	Civil No.: CV 04 00049 HG-BMK
)	(In Admiralty)
Plaintiff,)	
)	PLAINTIFF'S FIRST AMENDED
v.)	RESPONSE TO INTERROGATORY
)	NO. 11
MATSON NAVIGATION)	
COMPANY, INC.,)	
)	
Defendant.)	
_____)	

11. Describe accurately and fully in your own words exactly what occurred in the ten minutes prior to the occurrence, what occurred during the occurrence, and what occurred during the ten minutes after the occurrence including anything said by you or to you.

RESPONSE TO NO. 11:

I was unlocking a cone with a pole between rows 15 and 16. My right foot was on the catwalk and my left foot was on a padeye on the hatch lid. My left foot slipped and I lost my balance and fell. My left leg went into the gap between the catwalk and the inshore side of the

hatch lid and I was stuck. I was yelling for help for awhile, then Dan Farney helped me get out of the gap.

Dated: September 13, 2004

A handwritten signature in black ink, appearing to read "Preston Easley", written over a horizontal line.

PRESTON EASLEY

Attorney for Plaintiff

BERT MEYER

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Mailed

Delivered

Via Facsimile

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Attorneys for Defendants
MATSON NAVIGATION
COMPANY, INC.;
MATSON TERMINALS, INC.

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Capt. Robert Riley
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Dated: September 27, 2004

By



Patti Bannon